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September 9, 2021

BY ECF

The Honorable Valerie E. Caproni
United States District Judge
U.S. District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Velez*, 19 Cr. 862 (Deeshuntee Stevens)

Dear Judge Caproni:

I write on behalf of my client, Deeshuntee Stevens, to respectfully request permission for Mr. Stevens to travel from Rochester, NY, to New York City to attend the September 11 funeral of his cousin, with whom he maintained a close relationship. If granted permission, Mr. Stevens would travel by car to and from New York City, leaving Rochester in the evening of September 10. Mr. Stevens would spend the night of September 10 at a hotel in Queens. He would leave New York City to return to Rochester in the evening of September 11.

The funeral service will take place at 11 a.m. on September 11, at Maranatha Baptist Church (112-46 Springfield Blvd, Queens, NY 11429), with a reception afterwards at the home of his cousin, Octavia Sullivan, in Queens. The funeral and reception are consistent with New York State's rules with respect to

Hon. Valerie E. Caproni
September 9, 2021
Page 2

gatherings.¹ In addition, as Mr. Stevens is fully vaccinated, his attendance at both the funeral and the reception would be consistent with current CDC guidelines, which permit fully vaccinated people to “resume activities that [they] did prior to the pandemic.”²

The office of Pretrial Services takes no position with respect to this request and “defers to the Court.” The United States Attorney's Office defers to Pretrial Services' position on this request.

As the Court is aware, on June 10, 2021, Mr. Stevens pled guilty before your Honor to conspiring to distribute heroin and fentanyl in violation of 21 U.S.C. §§ 841(b)(1)(B) and 846. Your Honor permitted Mr. Stevens to remain on bail on the same conditions of release initially imposed on August 21, 2020. Those conditions include: (1) a \$100,000 personal recognizance bond, signed by Mr. Stevens and co-signed by three financially responsible persons; (2) home detention with electronic monitoring, except to attend work, to seek employment (with agreement of the office of Pretrial Services as to the specifics), and for medical visits and legal visits, at the Rochester, New York home of Jesseivett Orta, a close family friend serving as third-party custodian; and (3) travel restricted to the state of New York.

As the Court is also aware, Mr. Stevens has traveled to New York City with the Court's permission for family events and legal visits several times since he entered his guilty plea and on several prior occasions. Those trips were without incident.

¹ “Governor Andrew M. Cuomo today announced that COVID-19 restrictions are lifted immediately as 70 percent of New Yorkers aged 18 or older have received the first dose of their COVID-19 vaccination series.” New York State, *Governor Cuomo Announces COVID-19 Restrictions Lifted as 70% of Adult New Yorkers Have Received First Dose of COVID-19 Vaccine*, <https://www.governor.ny.gov/news/governor-cuomo-announces-covid-19-restrictions-lifted-70-adult-new-yorkers-have-received-first> (last updated Jun. 15, 2021).

² Centers for Disease Control and Prevention, *Interim Public Health Recommendations for Fully Vaccinated People*, <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/fully-vaccinated.html> (last updated Sept. 1, 2021).

Hon. Valerie E. Caproni
September 9, 2021
Page 3

Respectfully submitted,

s/ Jocelyn E. Strauber

cc: Assistant U.S. Attorney Adam S. Hobson
Assistant U.S. Attorney David Robles
Assistant U.S. Attorney Elinor L. Tarlow
U.S. Pretrial Services Officer Jonathan Lettieri
U.S. Pretrial Services Officer Jeremy Bedette

Application GRANTED.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over a horizontal line.

Date: September 9, 2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE